

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES M. BAKER, On behalf of himself and all
others similarly situated,

Plaintiff,

VS.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

ROCHELLE PHILLIPS, On behalf of herself and
all others similarly situated,

Plaintiff,

VS.

MBNA CORP., BRUCE L. HAMMONDS, and
KENNETH . VECCHIONE,

Defendants.

(Additional Captions Set Forth Below)

ROBERT WILKINS, Individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

Case No. 1:05-cv-00287-GMS

CLASS ACTION

LEONARD BRONSTEIN, On behalf of himself
and all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCHRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER, and JOHN W.
SCHEFLEN,

Defendants.

Case No. 1:05-cv-00289-GMS

CLASS ACTION

GREG PENN, On behalf of himself and all others
similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, and LANCE L. WEAVER,

Defendants.

Case No. 1:05-cv-00293-GMS

CLASS ACTION

CLIFFORD W. JONES, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS, and
KENNETH A. VECCHIONE,

Defendants.

Case No. 1:05-cv-00316-GMS

CLASS ACTION

MICHAEL D. BLUM, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, JOHN R.
COCRAN, III, RICHARD K. STRUTHERS, and
LANCE L. WEAVER

Defendants.

Case No. 1:05-cv-00372-GMS

CLASS ACTION

THOMAS J. CUSSEN, On behalf of himself and
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK, JOHN
R. COCRAN, III, MICHAEL G. RHODES,
LANCE L. WEAVER and JOHN W. SCHEFLEN,

Defendants.

Case No. 1:05-cv-00389-GMS

CLASS ACTION

**[PROPOSED] ORDER CONSOLIDATING ACTIONS AND APPOINTING
LEAD PLAINTIFF AND LEAD COUNSEL**

Having considered the motion of Activest Investmentgesellschaft mbH for account of the PT-Master fund, (“Activest”) and good cause appearing therefore, the Court orders as follows:

1. The Motion is GRANTED;
2. The above-captioned actions are consolidated pursuant to Fed. R. Civ. P. 42(a);
3. Activest is the “most adequate plaintiff” and accordingly, is appointed Lead Plaintiff pursuant to 15 U.S.C. 78u-4(a)(3)(B)(iii).
4. Milberg Weiss Bershad & Schulman LLP is appointed Lead Counsel pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v).

IT IS SO ORDERED.

DATED: _____, 2005

United States District Court Judge